

# **Exhibit 11**

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13 Attorneys for Plaintiffs

14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 **ETOPIA EVANS**, as the Representative of the)  
Estate of Charles Evans, *et al.*, )

19 )  
20 Plaintiffs, )

21 vs. )

22 **ARIZONA CARDINALS FOOTBALL**  
CLUB, LLC, *et al.*, )

23 Defendants. )  
24 )  
25 )  
26 )  
27 )  
28 )

CASE NO. 3:16-cv-1030-WHA

**PLAINTIFF ROBERT MASSEY'S  
ANSWERS TO DEFENDANT NFL  
MEMBER CLUBS' THIRD SET OF  
INTERROGATORIES**

1       **ANSWER:** Mr. Massey states that the injuries described in response to Interrogatory 1  
2 occurred in the following states: Louisiana, Arizona, Michigan, and New Jersey and accordingly,  
3 their state laws govern his state law claims in this case.

4       16. IDENTIFY the facts and circumstances (including pertinent dates) that first led  
5 YOU to "become aware that Defendants caused" each one of the injuries to YOU alleged,  
6 respectively, in Paragraphs 15, 17, 19, 21, 23, 25, 27, 29, 31, 33, 35, 37 and 29 of the Complaint,  
as well as any other injuries or harms for which YOU seek damages in this action.

7       **ANSWER:** In March 2014 Mr. Massey began communicating with Plaintiffs' counsel in  
8 connection with this litigation. At that time, Mr. Massey became aware for the first time that the  
9 NFL Member Clubs were engaged in a conspiracy to promote a return to play practice or policy  
10 whereby Medications were unlawfully provided to players in an effort to maximize revenue at  
11 the expense of players' health and safety. After being provided with this information, Mr.  
12 Massey first understood that the injuries about which he complains were caused by the NFL  
13 Member Clubs' conspiracy.

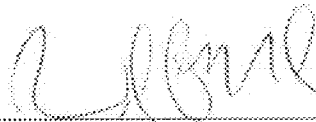
14       17. To the extent that YOUR claims in his case depend on the contention that one or  
15 more NFL Member Clubs failed to properly store MEDICATIONS and/or to keep records of the  
16 purchase and/or storage of MEDICATIONS (*see* Plaintiffs' Responses to Defendant NFL  
17 Member Clubs' First Set of Request for Admission, Responses to Request Nos. 79-117), explain  
how such alleged failures relate to YOUR claims and IDENTIFY all facts that support such a  
relationship, including the manner (if any) in which such failures injured YOU personally and  
the dates and circumstances under which any such injury occurred.

18       **ANSWER:** Such failures evidence unlawful conduct. If the 32 clubs all acted unlawfully  
19 in the same manner, and plaintiffs contend they did, a factfinder can draw the inference that they  
20 did so in concert, and thus these contentions related to the second of plaintiffs' two claims  
21 alleged in the original complaint: conspiracy. Plaintiffs are not in possession, custody or control  
22 of information or documents relating to how the Clubs stored medications or kept records;  
23 discovery will yield facts as to whether the failings at issue occurred.

24       Plaintiffs do not contend that these failures, in and of themselves, caused their injuries.  
25 Rather, these failings are evidence of the conspiracy pled that caused their injuries.  
26  
27  
28

1 DATED: November 4, 2016

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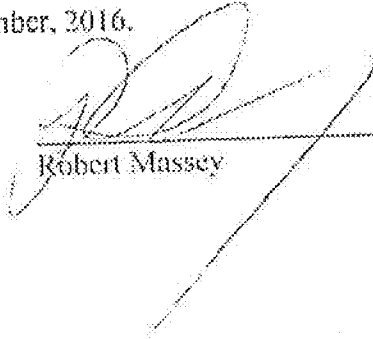
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VERIFICATION

I, Robert Massey, am familiar with the contents of my Answers to the Defendant NFL Member Clubs' Third Set of Interrogatories. My answers are based on, and therefore necessarily limited by, the records and information in existence, presently recollected, and thus far discovered in the course of prosecuting this action. Subject to the limitations set forth herein, and without waiving my right to amend these answers based on subsequently-identified information, I verify under penalty of perjury that my Answers are true and correct to the best of my knowledge, information and belief.

Executed this 2 day of November, 2016.



Robert Massey